



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

18 October 2001

Mr. Ed Boyle, Remedial Project Manager
US Department of the Navy
Engineering Field Activity Northeast
Naval Facilities Engineering Command
10 Industrial Highway
Lester, PA 19113-2090

RE: Screening Level Ecological Risk Assessment
IR Program Site 16
(Former Creosote Dip Tank and Fire Fighting Training Area)
Naval Construction Battalion Center
Davisville, Rhode Island
Submitted 12 October 2001, Dated 11 October 2001

Dear Mr. Boyle:

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document and comments are presented below:

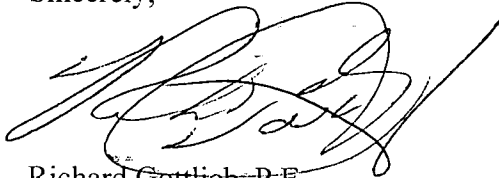
1. Page 2, Section 1.1.1, Environmental Setting of Site 16, Paragraph 2, Sentence 3 - "Non-hydric plants dominated this rip rap area, and site-visit participants agreed that the area lacked wetland characteristics." - Please revise the sentence to state that under RIDEM wetland regulations open waters are considered to be wetlands whether they exhibit wetland characteristics or not.
2. Table 2, Sources of Screening Benchmarks Used for Site 16, NCBC Davisville - With respect to surface soil Arsenic, Beryllium, Manganese, and more than half of the PAH benchmarks exceed RIDEM residential direct exposure criteria. For these constituents the benchmark must be lowered to the RIDEM residential direct exposure criteria. Exceedance of the RIDEM direct exposure criteria requires reporting and subsequent remediation of said soil whether there is an ecological risk or not.
3. Table 3, Site 16 Surface Soil COPC Screen - Beryllium and a number of PAHs exceed RIDEM residential direct exposure criteria. The same concern is noted here as is noted in comment 2, above.

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4. General Comment – Please state if the Navy has determined whether there are any rare or endangered species at this site.
5. General Comment – Please provide maps delineating the locations and concentration of the contaminants of potential concern (COPC) highlighting the location of the maximum concentration for each COPC. This will allow for a spatial analysis of the data perhaps focusing our efforts in one or more areas rather than the whole site.
6. General Comment - Based on the conclusions drawn from this study the Navy needs to indicate how it wants to proceed with this investigation, particularly since there are many hazard quotients which exceed 1.0.

RIDEM looks forward to working with the Navy and USEPA on the completion of the ecological risk assessment at this site. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138 or e-mail me at rgottlie@dem.state.ri.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Gottlieb', with a stylized flourish extending from the end.

Richard Gottlieb, P.E.
Principal Engineer

Cc: M. DeStefano, DEM OWM
C. Williams, EPA Region 1
D. Barney, CSO NCBC
H. Cohen, RIEDC
S. Licardi, ToNK
J. Shultz, EA Eng.